

THE INSTITUTE FOR JUSTICE

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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

**JENI PEARSONS and MICHAEL
STORC,**

Plaintiffs,

v.

**UNITED STATES OF AMERICA;
Federal Bureau of Investigation
Special Agent LYNNE ZELLHART,
in her individual capacity; and DOES
1 through 5, Federal Bureau of
Investigation agents in their
individual capacities,**

Defendants.

Case No. 2:23-cv-07952-RGK-MAR

Assigned to the Hon. R. Gary Klausner

**DECLARATION OF LOU
EGERTON-WILEY IN SUPPORT
OF *PRO HAC VICE* APPLICATIONS**

Action Filed: September 22, 2023

Trial Date: None

DECLARATION OF LOU EGERTON-WILEY

I, Lou Egerton-Wiley, declare as follows:

1. I am an attorney with The Vora Law Firm, P.C. licensed to practice in the State of California and admitted to practice in this Court. I am counsel for Plaintiffs Jeni Pearsons and Michael Storc in the above-captioned matter. I have personal knowledge of the matters set forth in this Declaration and could and would competently testify to them under oath if called as a witness.

2. I am non-binary. I use the name Lou because it is gender-affirming. I have not yet legally changed my name.

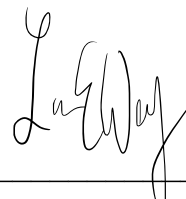
3. I am barred in California (SBN 323482) and admitted in the Central District of California under my legal name, Amy Egerton Wiley.

4. On October 5, 2023, I submitted Applications for Joseph R. Gay, Robert P. Frommer, and Robert E. Johnson to appear *pro hac vice* in this case. I submitted the Applications under Lou Egerton-Wiley because that is the name I go by both personally and professionally as a non-binary person.

5. On October 10, 2023, I received a call from this Court's Courtroom Deputy, Mr. Joseph Remigio, instructing me to submit a declaration explaining why my name on the *pro hac vice* Applications differed from the name under which I am barred in California and admitted in the Central District of California. I am accordingly filing this Declaration to explain why I filed the Applications under the name Lou Egerton-Wiley.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed this 10th day of October 2023, at Los Angeles, California.



Lou (Amy) Egerton-Wiley